

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|---------------------------------|---|-------------------------|
| In re: |) | |
| |) | Chapter 11 |
| |) | |
| STEWARD HEALTH CARE SYSTEM LLC, |) | Case No. 24-90213 (CML) |
| <i>et al.</i> , |) | |
| |) | |
| Debtors. ¹ |) | (Jointly Administered) |
| |) | |

**THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS’
WITNESS AND EXHIBIT LIST FOR HEARING ON AUGUST 16, 2024**

The Official Committee of Unsecured Creditors (the “Committee”) of Steward Health Care System LLC, *et al.* (the “Debtors”), by and through its undersigned counsel, hereby submit this witness and exhibit list (the “Witness and Exhibit List”) for the hearing (the “Hearing”) scheduled for **August 16, 2024 at 10:00 a.m. (prevailing Central Time)** before the Honorable Christopher M. Lopez at the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Court”), 515 Rusk Street, Courtroom 401, Houston, Texas 77002.

WITNESSES

The Committee may call any of the following witnesses at the Hearing:

1. Any witness necessary to lay the foundation for the admission of exhibits;
2. Any witness listed or called by any other party; and
3. Any rebuttal and/or impeachment witnesses.

The Committee reserves the right to cross-examine any witness called by any other party.

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://restructuring.ra.kroll.com/Steward>. The Debtors’ service address for purposes of these chapter 11 cases is 1900 N. Pearl Street, Suite 2400, Dallas, Texas 75201.

EXHIBITS

The Committee may offer into evidence any one or more of the following exhibits:

| EXHIBIT NO. | DESCRIPTION | M A R K | O F F E R | O B J E C T | A D M I T | W/D | Disposition After Hearing |
|--------------------|--|----------------------------|----------------------------------|--|----------------------------------|------------|--|
| | Any exhibit necessary to rebut the evidence or testimony of any witness offered or designated by any other party | | | | | | |
| | Any exhibit necessary for impeachment purposes | | | | | | |
| | Any exhibit listed by any other party | | | | | | |
| | Any documents produced by any party pursuant to discovery requests | | | | | | |
| | Any pleading or document filed in the above-captioned case | | | | | | |

RESERVATION OF RIGHTS

The Committee reserves all rights, including but not limited to the right to amend, revise, supplement, or withdraw this Witness and Exhibit List at any time, to designate additional witnesses and exhibits, to call or cross examine any person identified as a witness by any other party in interest or introduce any document identified as an exhibit by any other party in interest, and to offer additional witnesses and exhibits at the Hearing for purposes of impeachment or rebuttal, in response to witnesses and evidence offered by any other party, and for any other permissible purpose under the Federal Rules of Bankruptcy Procedure, the Federal Rules of Civil Procedure, and the Federal Rules of Evidence.

Dated: August 14, 2024

AKIN GUMP STRAUSS HAUER & FELD LLP

/s/ Marty L. Brimmage Jr.

Sarah Link Schultz (State Bar No. 24033047;

S.D. Tex. 30555)

Marty L. Brimmage Jr. (State Bar No. 00793386;

S.D. Tex. 30464)

Lacy M. Lawrence (State Bar No. 24055913;

S.D. Tex. 995675)

2300 N. Field Street, Suite 1800

Dallas, TX 75201-2481

Telephone: (214) 969-2800

Facsimile: (214) 969-4343

Email: sschultz@akingump.com

Email: mbrimmage@akingump.com

Email: llawrence@akingump.com

-and-

Ira S. Dizengoff (admitted *pro hac vice*)

Brad M. Kahn (admitted *pro hac vice*)

Avi E. Luft (admitted *pro hac vice*)

One Bryant Park

New York, NY 10036-6745

Telephone: (212) 872-1000

Facsimile: (212) 872-1002

Email: idizengoff@akingump.com

Email: bkahn@akingump.com

Email: aluft@akingump.com

*Counsel to the Official Committee of Unsecured
Creditors of Steward Health Care System LLC,
et al.*

Certificate of Service

I certify that on August 14, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Marty L. Brimmage Jr.

Marty L. Brimmage Jr.